

<u>Date</u>	<u>Attorney/Staff</u>	<u>Description</u>	<u>Time</u>	<u>Billing Rate</u>	<u>Total Costs</u>
5/7/2014	Jason Lopez	Extracting and uploading POA document production to network; Loading documents and images into production database and image collection. QC'ing images and data.	4.1	\$255.00	\$1,045.50
5/8/2014	Lawrence Larose	Review mediation order regarding confidentiality (0.3); Attention to e-mails from AF regarding production of mediation documents (0.5).	0.8	\$950.00	\$760.00
5/8/2014	Samuel Kohn	Review and analyze documents and correspondence regarding City's breach of privileged mediation documents (.4); teleconferences and correspondence with insurer counsel regarding same (.5); office conferences with L. Larose and CP team regarding scope and procedure forward regarding same (.4); review and revise communication to City's counsel regarding same (.4); office conferences with CP team regarding same (.2); review and analyze documents and correspondence regarding procedure forward regarding same (.3)	2.2	\$805.00	\$1,771.00
5/8/2014	Robert Schwinger	Investigating City's improper production of mediation-related communications, including meetings, e-mails and TCs with L. Schapira re same (1.8); Draft demand letter to City re its improper production of mediation-related communications (0.6); E-mails internally and with UTGO mediation parties re demand letter to City (0.4); Review City's clawback request letter (0.3); E-mails, TCs with Sidley, Arent Fox re reaction to City's clawback request letter (0.5); Supervise drafting of motion to compel re City's production of mediation-related communications (0.7); Editing M. Bhargava's draft of motion to compel re City's production of mediation-related communications (1.0); Meetings with L. Schapira re draft of motion to compel re City's production of mediation-related communications (0.2).	5.5	\$835.00	\$4,592.50
5/8/2014	Michael Bhargava	Draft and revise motion to compel City of Detroit to claw back documents (2.8); phone conferences with L. Schapira, B. Schwinger, S. Kohl re same (.5); case law research re same (.4); review documents re same (.2).	3.9	\$705.00	\$2,749.50
5/8/2014	Lata Nott	Drafting ex parte motion for motion to compel clawback of improperly produced documents (1.1); drafting notice of motion (0.5); proofreading and editing (0.5).	2.1	\$505.00	\$1,060.50
5/8/2014	Lisa Schapira	Respond to inquiries regarding mediation-related communication (3.0); draft clawback motion (3.0).	6.0	\$615.00	\$3,690.00
5/8/2014	Robin Ball	Emails re City's mediation document breach, conferred re same with R. Schwinger and L. Schapira (.4); conference call with Sidley re City's mediation document breach (.4); reviewed draft letter re mediation document breach, emails re same (.3); emails re additional mediation documents (.1).	1.2	\$705.00	\$846.00
5/8/2014	Seth Bloomfield	Confer with L. Schapira regarding mediation privilege and mediation orders (.1).	0.1	\$405.00	\$40.50
5/9/2014	Lawrence Larose	Attention to e-mails regarding motion to compel (0.2); Review and revise motion regarding Clawback (0.5); Document review of mediation documents (1).	1.7	\$950.00	\$1,615.00
5/9/2014	Samuel Kohn	Review and finalize motion to compel clawback of City's document production and reproduce expeditiously (.5); teleconferences and correspondence with insurer counsel regarding same (.4); review and analyze documents and correspondence regarding same (.3); office conferences with CP team regarding same and ex parte order regarding same (.4).	1.6	\$805.00	\$1,288.00
5/9/2014	Robert Schwinger	Finalizing motion re full clawback of City's document production in light of its including privileged mediation-related documents, including internal TCs, meetings, e-mails and edits (3.4) ; TC, e-mails with Sidley, Arent Fox re finalization of motion re full clawback of City's document production (0.4)	3.8	\$835.00	\$3,173.00
5/9/2014	Michael Bhargava	Phone conference with B. Schwinger, L Schapira re clawback motion (.3)	0.3	\$705.00	\$211.50
5/9/2014	Lata Nott	Revisions to motion to clawback, ex parte motion to expedite, and accompanying exhibits (1.5)	1.5	\$505.00	\$757.50

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5/9/2014	Lisa Schapira	Revise and finalize clawback motion (1.5); revise motion to expedite re clawback motion (1.5)	3.0	\$615.00	\$1,845.00
5/9/2014	Robin Ball	Reviewed drafts of clawback motion (0.4); emails re same, strategic issues (0.2); conference call with R. Schwinger et al. re clawback motion and discovery issues (0.5).	1.1	\$705.00	\$775.50
5/9/2014	Abbe Lowell	Review motions regarding wrongful disclosure (0.4).	0.4	\$995.00	\$398.00
5/9/2014	Jason Lopez	Exporting set of "clawback" documents from production database.	0.7	\$255.00	\$178.50
5/12/2014	Lawrence Larose	Finalize Claw Back Order.	0.5	\$950.00	\$475.00
5/12/2014	Samuel Kohn	Participate telephonically on portion of bankruptcy court hearing related to the clawback motion and court ruling (1); conferences and correspondence with CP team regarding same and meet and confer with City regarding same (.5); review and revise draft proposed order regarding clawback (.4); communicate with CP team regarding same (.3).	2.2	\$805.00	\$1,771.00
5/12/2014	Robert Schwinger	Attend/argue at court hearing on motion to compel clawback of City's documents and on discovery matters, and conferences with other counsel re same during break periods (0.6); Review drafts of proposed order on clawback motion and e-mails re comments on same (0.3).	0.9	\$835.00	\$751.50
5/12/2014	Lisa Schapira	Telephone with R. Schwinger and S. Kohn regarding clawback order and draft order (2.2).	2.2	\$615.00	\$1,353.00
5/13/2014	Robert Schwinger	Meetings with L. Schapira re compliance with clawback order (0.8); TCs with L. Schapira re next steps on review of City's documents in light of interruption caused by clawback order (0.3); Purging personal electronic and paper material per clawback order (0.4); Review, mark up draft of compliance certification re clawback order (0.5).	2.0	\$835.00	\$1,670.00
5/13/2014	Lisa Schapira	Conference with R. Schwinger regarding compliance with Clawback order (.3); draft instructions instructing compliance with clawback order and correspond with attorneys and litigation support regarding attaining compliance (2.5); draft certification of compliance with clawback order (.4).	3.2	\$615.00	\$1,968.00
5/13/2014	Robin Ball	Reviewed clawback order, L. Schapira memo re materials to be deleted/destroyed, and deleted/destroyed affected materials (0.7); t/c, emails w/L. Schapira re same (0.2).	0.9	\$705.00	\$634.50
5/13/2014	NA	Federal Express delivery charge for returning the hard drive to the City.	NA	NA	\$18.54
5/14/2014	Samuel Kohn	Review City's document production for deletion in accordance with clawback order (.6); conferences and correspondence with L. Schapira regarding same (.4)	1.0	\$805.00	\$805.00
5/14/2014	Robert Schwinger	E-mails internally re clawback compliance (0.2).	0.2	\$835.00	\$167.00
5/14/2014	Nicholas Chandler	Reviewed all stored documents and communications in accordance with clawback procedure established by L. Schapira (0.4); corresponded with L. Schapira about same (0.2).	0.6	\$405.00	\$243.00
5/14/2014	Lisa Schapira	Confirm with attorneys and staff re compliance with Clawback order and finalize certification (1.6).	1.6	\$615.00	\$984.00
5/14/2014	Robin Ball	Reviewed drafts of clawback certification and emails w/L. Schapira re same (0.4).	0.4	\$705.00	\$282.00
5/14/2014	Seth Bloomfield	Comply with clawback order (0.1).	0.1	\$405.00	\$40.50
5/14/2014	Jason Lopez	Deleting all POA production images and data from production database; Locating and deleting POA production images and data from network and workstation locations.	2.6	\$255.00	\$663.00
5/19/2014	Lisa Schapira	Review clawback certifications and follow-up with delinquent parties (1.0).	1.0	\$615.00	\$615.00
5/21/2014	Michael Bhargava	Draft and revise motion for costs (2.2); case law research re same (0.4); email communications with L. Schapira re same (0.1)	2.7	\$705.00	\$1,903.50
5/23/2014	Robert Schwinger	Review M. Bhargava's draft motion to recover costs associated with clawback of mediation-privileged material (0.4); E-mail with M. Bhargava re draft motion to recover costs associated with clawback of mediation-privileged material (0.2).	0.6	\$835.00	\$501.00
5/28/2014	Michael Bhargava	Draft and revise motion for costs for clawback motion (1.6); email communications with R. Schwinger re same (0.1).	1.7	\$705.00	\$1,198.50

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5/29/2014	Robert Schwinger	Revise M. Bhargava's draft motion to recover costs re clawback (0.6); Follow-up with Lisa Schapira re additional information needed for motion for costs re clawback (0.1).	0.7	\$835.00	\$584.50
6/6/2014	Lisa Schapira	Revise M. Bhargava's draft motion to recover costs re clawback to incorporate comments of R. Schwinger (0.8).	0.8	\$615.00	\$492.00
6/12/2014	Lisa Schapira	Revise M. Bhargava's draft motion to recover costs re clawback to incorporate comments of R. Schwinger (0.8); Revise draft motion to recover costs re clawback to incorporate comments of L. Larose (0.9).	0.9	\$615.00	\$553.50
6/13/2014	Nicholas Chandler	Review time entries and finalized Exhibit A. (1.4).	1.4	\$405.00	\$567.00

TOTAL = \$45,038.54